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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**H.A. Parts Products of Indiana Company
2200 State Route 240 East
Greencastle, Indiana 46135**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T133-12660-00019	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 19, 2002 Expiration Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic automotive trim molding and surface coating operation.

Responsible Official:	Toshi Ohki, President
Source Address:	2200 State Road 240 East, Greencastle, IN 46135
Mailing Address:	P.O. Box 157, Greencastle, Indiana 46135
General Source Phone Number:	765-653-2000
SIC Code:	3089, 3465
County Location:	Putnam
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Old Paint Room

- (a) one (1) paint spray booth, identified as Booth A (OPA), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPA-1 and OPA-2;
- (b) one (1) paint spray booth, identified as Booth B (OPB), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through one (1) stack, identified as OPB-1;
- (c) one (1) paint spray booth, identified as Booth D (OPD), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPD-1 and OPD-2;
- (d) one (1) paint spray booth, identified as Booth E (OPE), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as OPE-1, OPE-2, and OPE-3;
- (e) one (1) Mask washer, identified as Mask Washer #1, constructed in 1989, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as OPM-1;

New Paint Room

- (f) one (1) robot paint spray system, consisting of the following:
 - (1) one (1) Primer coat spray booth (NPP), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPP-1 and NPP-2;
 - (2) one (1) Primer coat flash/setting zone, exhausting through one (1) stack, identified as NPP-3;

- (3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;
- (4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;
- (5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;
- (6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;
- (7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;
- Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.
- (g) one (1) paint line, identified as the Small Parts Line, consisting of the following:
 - (1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
 - (2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and
 - (3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;
- (h) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:
 - (1) one (1) Loading Clean Room;
 - (2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);
 - (3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);
 - (4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);
 - (5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);
 - (6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);
 - (7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);
 - (8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);
 - (9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);
 - (10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);
 - (11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and
 - (12) one (1) clean room for unloading of painted parts.
- (i) one (1) Mask washer, identified as Mask Washer #5, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;
- (j) one (1) Mask washer, identified as Mask Washer #6, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;
- (k) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

Co-Extrusion

- (l) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

- (m) two (2) flockers for adhesive application, identified as FL101 and FL112, both constructed in 1989, each utilizing an air atomization spray application system, each equipped with one (1) infrared (IR) oven, with each flocker exhausting through one (1) stack, identified as F1 and F4, respectively, and each IR oven exhausting through one (1) stack, identified as F2 and F3, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:
 - (1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4].
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including four (4) parts washers, identified as Tool & Die parts washer, Dept. 200 parts washer, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2 (c)].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (2) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
 - (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
 - (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;

- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(d) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **Opacity [326 IAC 5-1]**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
 - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:

- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee’s current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee’s current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Old Paint Room

- (a) one (1) paint spray booth, identified as Booth A (OPA), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPA-1 and OPA-2;
- (b) one (1) paint spray booth, identified as Booth B (OPB), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through one (1) stack, identified as OPB-1;
- (c) one (1) paint spray booth, identified as Booth D (OPD), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPD-1 and OPD-2;
- (d) one (1) paint spray booth, identified as Booth E (OPE), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as OPE-1, OPE-2, and OPE-3;
- (e) one (1) Mask washer, identified as Mask Washer #1, constructed in 1989, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as OPM-1;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP-133-5802-00019, issued October 7, 1996, the best available control technology (BACT) for the spray coating of plastic automobile trim in Booths A, B, D, and E shall be the use of a high volume low pressure (HVLP) spray gun with a closed-loop internal mix manifold system at all times during which this process is operated. The total amount of volatile organic compounds (VOC) delivered to the applicators in Booths A, B, D, and E shall not exceed 34.2 tons per twelve (12) consecutive month period. This usage limit is equivalent to 34.2 tons of VOC per twelve (12) consecutive month period.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the Old Paint Room spray booths, identified as Booths A, B, D, and E shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for Mask Washer #1, a cold cleaning operation constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

In order to comply with Condition D.1.2, the closed loop internal mix system and water wash system for PM control shall be in operation and control emissions from Booths A, B, D, and E at all times when the four (4) paint booths (Booths A, B, D, and E) are in operation.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash system. To monitor the performance of the water wash system, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs OPA-1, OPA-2, OPB-1, OPD-1, OPD-2, OPE-1, OPE-2, and OPE-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

New Paint Room

- (f) one (1) robot paint spray system, consisting of the following:
- (1) one (1) Primer coat spray booth (NPP), constructed in 1999, utilizing a High Volume Low Pressure (HVLV) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPP-1 and NPP-2;
 - (2) one (1) Primer coat flash/setting zone, exhausting through one (1) stack, identified as NPP-3;
 - (3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLV) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;
 - (4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;
 - (5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLV) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;
 - (6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;
 - (7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;
- Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.
- (g) one (1) paint line, identified as the Small Parts Line, consisting of the following:
- (1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLV) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
 - (2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and
 - (3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;
- (h) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:
- (1) one (1) Loading Clean Room;
 - (2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);
 - (3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);
 - (4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);
 - (5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);
 - (6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);
 - (7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);
 - (8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);
 - (9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);
 - (10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);

- (11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and
- (12) one (1) clean room for unloading of painted parts.
- (i) one (1) Mask washer, identified as Mask Washer #5, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;
- (j) one (1) Mask washer, identified as Mask Washer #6, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;
- (k) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP-133-8608-00019, issued October 6, 1997, the best available control technology (BACT) for the two (2) paint lines (the robot paint spray system and the Small Parts Line) shall be:
 - (1) the use of a high volume low pressure (HVLP) spray application system with a closed loop internal mix manifold system;
 - (2) the use of a water wash system for overspray control, consisting of a water fall and water pan, at all times during which the robot paint spray system and the Small Parts Paint Line are in operation; and
 - (3) The total amount of VOC delivered to the applicators of the robot paint spray system and the Small Parts Line shall not exceed 63.6 tons per twelve (12) consecutive month period. This usage limit is equivalent to 63.6 tons of VOC per twelve (12) consecutive month period.
- (b) Pursuant to Significant Source Modification No. 133-14228-00019, pending with the OAQ, the operation of the robot paint conveyor system without the use of add-on controls and with the following work practice and emission limitation will satisfy the BACT requirements:
 - (1) The coatings applied in each of the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall be applied using High Volume Low Pressure (HVLP) Spray Application guns.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
 - (2) The total usage of VOC in the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall not exceed 97.85 tons per twelve (12) consecutive month period. This usage limit is equivalent to 97.85 tons of VOC per twelve (12) consecutive month period.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total input of VOC to the robot paint spray system, the Small Parts line, and the robot paint conveyor system shall not exceed 138.07 tons per 12 consecutive month period, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Any change or modification which increases emissions from the robot paint spray system, the Small Parts line, the robot paint conveyor system, Mask Washer #5, Mask Washer #6, or Mask Washer #7 of any single HAP or any combination of HAPs to greater than 10 and 25 tons per year, respectively, shall be subject to the requirements of 326 IAC 2-4.1-1 and must be approved by the Office of Air Quality before such change can occur.

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to CP 133-8608-00019, issued on October 6, 1997, and pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the robot paint spray system and the Small Parts Booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to Significant Source Modification 133-14228-00019, pending with the OAQ, and pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the primer coat, base coat, and the clear coat spray booths of robot paint conveyor system shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for Mask Washer #5, Mask Washer #6, and Mask Washer #7, which are cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) for Mask Washer #5, Mask Washer #6, and Mask Washer #7, the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the robot paint spray system, the Small Parts Line, and the robot paint conveyor operation and their control devices.

Compliance Determination Requirements

D.2.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.9 VOC Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.10 Particulate Matter (PM)

In order to comply with Condition D.2.4, each of the closed loop internal mix systems and water wash systems for PM control shall be in operation and control emissions from the Prime coat booth, the Base coat booth, and the Clear coat booth of the robot paint spray system, the Small Parts Booth, and the primer coat, base coat, and the clear coat spray booths of the robot paint conveyor system at all times when these paint booths are in operation.

D.2.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash systems. To monitor the performance of the water wash systems, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs NPP-1, NPP-2, NPB-1, NPB-2, NPB-3, NPC-1, NPC-2, NPS-1, NPS-2, #2, #5, #6, and #9) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2 and the maximum HAP emissions established in Condition D.2.3.
 - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and

- (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.10 and D.2.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Co-Extrusion

- (l) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

Flocking

- (m) two (2) flockers for adhesive application, identified as FL101 and FL112, both constructed in 1989, each utilizing an air atomization spray application system, each equipped with one (1) infrared (IR) oven, with each flocker exhausting through one (1) stack, identified as F1 and F4, respectively, and each IR oven exhausting through one (1) stack, identified as F2 and F3, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) The total usage of VOC in the eight (8) co-extrusion lines shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, which is equivalent to less than twenty-five (25) tons of VOC emissions per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.
- (b) Any change or modification which increases emissions of VOC from the two (2) flockers to greater than 25 tons per year, shall be subject to the requirements of 326 IAC 8-1-6 and must be approved by the Office of Air Quality before such change can occur.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the two (2) flockers shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.3.4 VOC Emissions

Compliance with Condition D.3.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Monitoring

- (a) To demonstrate compliance with condition D.3.2, weekly observations shall be made of the overspray from each of the two (2) flocker stacks (Stack IDs F1 and F4) while one or more of the flockers are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the adhesive emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below for the eight (8) co-extrusion lines and the two (2) flockers. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain a log of weekly overspray observations and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:
 - (1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4].
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including four (4) parts washers, identified as Tool & Die parts washer, Dept. 200 parts washer, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 9.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

Degreasing operations

Emission Limitations and Standards [326 IAC 2-7-5(1)] (Cold Cleaning Degreaser Operations)

D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.3 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019
Facility: Booths A, B, D, and E
Parameter: VOC usage
Limit: The total amount of volatile organic compounds (VOC) delivered to the applicators shall not exceed 34.2 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019
Facility: Robot paint spray system and Small Parts Booth
Parameter: VOC usage
Limit: The total amount of VOC delivered to the applicators of the robot paint spray system and the Small Parts Line shall not exceed 63.6 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019
Facility: Robot paint conveyor system
Parameter: VOC usage
Limit: The total usage of VOC in the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall not exceed 97.85 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019
Facility: Robot paint spray system, Small Parts Booth, and Robot paint conveyor system
Parameter: VOC usage
Limit: The total input of VOC to the robot paint spray system, the Small Parts line, and the robot paint conveyor system shall not exceed 138.07 tons per 12 consecutive month period, including coatings, dilution solvents, and cleaning solvents.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019
Facility: eight (8) co-extrusion lines
Parameter: VOC usage
Limit: The total usage of VOC in the eight (8) co-extrusion lines shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
Part 70 Permit No.: T133-12660-00019

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: H.A. Parts Products of Indiana Company
 Source Location: 2200 State Road 240 East, Greencastle, Indiana 46135
 County: Putnam
 SIC Code: 3465, 3089
 Operation Permit No.: T133-12660-00019
 Permit Reviewer: Trish Earls/EVP

On December 20, 2001, the Office of Air Quality (OAQ) had a notice published in the Banner Graphic, Greencastle, Indiana, stating that H.A. Parts Products of Indiana Company had applied for a Part 70 Operating Permit to operate a plastic automotive trim molding and surface coating operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. A new rule cite has been added to condition B.2, Permit Term, as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

2. In condition B.12, Emergency Provisions, paragraphs (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

-
- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation; ~~except as provided in 326 IAC 2-7-16.~~
 - (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (g) ~~Operations may continue during an emergency only if the following conditions are met:~~

- ~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
- ~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
- ~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
- ~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~
- ~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

3. Condition B.14, Multiple Exceedances, has been deleted because 326 IAC 2-7-5(1)(E) has been repealed because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. A new condition B.14, Prior Permit Conditions Superseded, was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,**
- (2) revised, or**
- (3) deleted**

by this permit.

(b) All previous registrations and permits are superseded by this permit.

5. Paragraph (b) has been removed from condition B.13, Permit Shield. Since condition B.14, Prior Permits Superseded, has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6. In paragraph (c)(2) of condition C.14 Compliance Response Plan - Failure to Take Response Steps, "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications. Also, the name of the condition has been changed to better reflect the contents of the condition.

C.18 Compliance Response Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: H.A. Parts Products of Indiana Company, Inc.
Source Location: 2200 State Road 240 East, Greencastle, Indiana 46135
County: Putnam
SIC Code: 3465, 3089
Operation Permit No.: T133-12660-00019
Permit Reviewer: Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from relating to the operation of a plastic automotive trim molding and surface coating operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Old Paint Room

- (a) one (1) paint spray booth, identified as Booth A (OPA), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPA-1 and OPA-2;
- (b) one (1) paint spray booth, identified as Booth B (OPB), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 20 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through one (1) stack, identified as OPB-1;
- (c) one (1) paint spray booth, identified as Booth D (OPD), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through two (2) stacks, identified as OPD-1 and OPD-2;
- (d) one (1) paint spray booth, identified as Booth E (OPE), constructed in 1989, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 24 plastic automotive trim pieces per hour, using a closed loop internal mix system and a water wash system for overspray control, and exhausting through three (3) stacks, identified as OPE-1, OPE-2, and OPE-3;

New Paint Room

- (e) one (1) robot paint spray system, consisting of the following:
 - (1) one (1) Primer coat spray booth (NPP), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPP-1 and NPP-2;
 - (2) one (1) Primer coat flash/setting zone, exhausting through one (1) stack, identified as NPP-3;
 - (3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;
 - (4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;
 - (5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;
 - (6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;
 - (7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;

Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.
- (f) one (1) paint line, identified as the Small Parts Line, consisting of the following:
 - (1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
 - (2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and
 - (3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;
- (g) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:
 - (1) one (1) Loading Clean Room;
 - (2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);
 - (3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);
 - (4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);
 - (5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);
 - (6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);
 - (7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);
 - (8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);
 - (9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);

- (10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);
- (11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and
- (12) one (1) clean room for unloading of painted parts.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

Old Paint Room

- (a) one (1) Mask washer, identified as Mask Washer #1, constructed in 1989, using a maximum of 22.5 gallons per day of solvent, exhausting through one (1) stack, identified as OPM-1;

New Paint Room

- (b) one (1) Mask washer, identified as Mask Washer #5, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;
- (c) one (1) Mask washer, identified as Mask Washer #6, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;
- (d) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

Note: The New Paint Room also included a dry spray booth that was constructed in October, 1999 and operated without a permit. However, this booth was removed from the source in September, 2000.

Co-Extrusion

- (e) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

Flocking

- (f) two (2) flockers for adhesive application, identified as FL101 and FL112, both constructed in 1989, each utilizing an air atomization spray application system, each equipped with one (1) infrared (IR) oven, with each flocker exhausting through one (1) stack, identified as F1 and F4, respectively, and each IR oven exhausting through one (1) stack, identified as F2 and F3, respectively.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour including:

- (1) one (1) natural gas-fired flexible water tube package boiler, located in the New Paint Room, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, exhausting through one (1) stack, identified as NPBM-1 [326 IAC 6-2-4];
- (2) two (2) natural gas-fired bake ovens, located in the New Paint Room, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;
- (3) one (1) natural gas-fired bake oven, located in the New Paint Room, with a maximum heat input of 0.4 MMBtu per hour;
- (4) one (1) convection curing oven for the robot paint conveyor system, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15);
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (c) Combustion source flame safety purging on startup.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Equipment used exclusively for the following:
 - (1) Packaging lubricants and greases.
 - (2) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including four (4) parts washers, identified as Tool & Die parts washer, Dept. 200 parts washer, Dept. 300 parts washer, and Dept. 400 parts washer, each with a maximum capacity of 100 gallons of solvent [326 IAC 8-3-2, 326 IAC 8-3-5].
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (j) Closed loop heating and cooling systems.
- (k) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility (city controlled).
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (m) Heat exchanger cleaning and repair.
- (n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (o) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (p) On-site fire and emergency response training approved by the department.
- (q) Stationary fire pumps.
- (r) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (s) Activities with emissions less than or equal to insignificant activity thresholds:
 - (1) four (4) IR electric dryers for each of the four (4) old paint room spray booths;
 - (2) one (1) IR electric dryer for the new paint room;
 - (3) injection molding equipment; and
 - (4) one (1) annealing oven.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 133-5802-00019, issued on October 7, 1996;
- (b) CP 133-8608-00019, issued on October 6, 1997;
- (c) First Notice-only change 133-10670-00019, issued March 23, 1999;
- (d) Exemption 133-11073-00019, issued February 2, 2000; and
- (e) Significant Source Modification No. 133-14228-00019, pending.

All conditions from previous approvals were incorporated into this Part 70 permit.

Note: CP 133-5802-00019 and CP 133-8608-00019 both included conditions with 326 IAC 8-1-6 BACT requirements for the Old Paint Room and the New Paint Room, respectively. Those BACT determinations included VOC emission caps that were equal to the potential VOC emissions that were calculated based on the respective permit applications. Potential VOC emissions for the units included in those BACT conditions were re-calculated during the Title V permit application review based on the original Title V application and additional information later provided by the source. Since potential VOC emissions from the units included in those BACT conditions are less than or equal to the potential emissions that the original BACT determinations were based on, the BACT determinations remain valid. However, the VOC emission limits included in those BACT determinations were expressed in terms of tons per month. These limits will be revised to be in terms of tons per twelve (12) consecutive month period.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) IDEM is aware that the spray booths identified as Booths A, B, D, & E, the Prime coat, Base coat, and clear coat spray booths in the robot paint spray system, and the Small Parts booth are not in compliance with the BACT determinations pursuant to 326 IAC 8-1-6 as permitted in CP 133-5802-00019, issued October 7, 1996 and CP 133-8608-00019, issued October 6, 1997. These determinations required the use of HVLP spray guns to apply coatings in these booths. Until now, the source had been unable to implement HVLP guns in these spray booths. The BACT conditions in the above referenced permits are as follows:

Operation Condition 8, CP 133-5802-00019

- 8. That pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the best available control technology (BACT) for the spray coating of plastic automobile trim shall be the use of a high volume low pressure (HVLP) spray gun with a closed-loop internal mix manifold system at all times during which this process is operated. The total amount of volatile organic compounds (VOC) delivered to the applicators shall not exceed 2.85 tons per month.

Operation Condition 12, CP 133-8608-00019

- 12. That pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the two (2) paint lines (the Large Parts Line and the Small Parts Line) shall be the use of: (a) a high volume low pressure (HVLP) spray application system with a closed loop internal mix manifold system; and (b) a water wash system for overspray control, consisting of a water fall and water pan, at all times during which the Large Parts Paint Line and the Small Parts Paint Line are in operation. The total amount of VOC delivered to the applicators of the Large Parts Line and the Small Parts Line shall not exceed 5.3 tons per month.

Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.

- (d) IDEM is reviewing this matter and has taken appropriate action. In a letter received on August 6, 2001, the source has stated that they are purchasing HVLP guns and will be implementing these guns by October 1, 2001. This will satisfy the requirements of the above stated requirement.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on August 25, 2000. Additional information was received on July 16, 2001, September 17, 2001, and October 18, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (13 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	greater than 10
Ethyl Benzene	greater than 10
MEK	greater than 10
Toluene	greater than 10
Isopropylbenzene	less than 10
Glycol Ethers	less than 10
Methyl Methacrylate	less than 10
MIBK	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	not reported
SO ₂	not reported
VOC	14.0
CO	not reported
NO _x	not reported
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Old Paint Room (Booths A, B, D & E)*	0.17	0.17	0.0	34.2	0.0	0.0	11.58

Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
New Paint Room (Robot Paint Spray System & Small Parts Line)**	0.09	0.09	0.0	40.22	0.0	0.0	10.04
New Paint Room (Flocking & Co-Extrusion)	3.35	3.35	0.0	39.79	0.0	0.0	34.98
New Paint Room (Robot Paint Conveyor System)**	0.55	0.55	0.0	97.85	0.0	0.0	18.97
Mask Washers (Old and New Paint Rooms)	0.0	0.0	0.0	37.50	0.0	0.0	37.50
Natural Gas Combustion	0.12	0.47	0.04	0.34	5.15	6.13	0.12
Total Emissions	4.28	4.63	0.04	<250.0	5.15	6.13	113.19

* VOC emissions from Old Paint Room represent VOC emission limit pursuant to 326 IAC 8-1-6 as permitted in CP-133-5802-00019, issued October 7, 1996.

** Total VOC emissions from the Robot Paint Spray System, the Small Parts Line and the Robot Paint Conveyor System in the New Paint Room will be limited to 138.07 tons per year so that the requirements of 326 IAC 2-2 (PSD) do not apply. This limit includes a VOC emission limit of 97.85 tons per year for the Robot Paint Conveyor System pursuant to 326 IAC 8-1-6 as permitted in SSM 133-14228-00019, still pending.

County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Putnam County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This source is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.390, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations). This rule applies to affected facilities in an automobile or light-duty truck assembly plant. Exempt from this rule are operations used to coat plastic body components or all-plastic automobile or light duty truck bodies on separate coating lines. H.A. Part Products of Indiana Company coats plastic automobile trim, not vehicle bodies, and does not assemble automobiles or light-duty trucks, therefore, the requirements of 40 CFR Part 60.390, Subpart MM do not apply.
- (b) The natural gas-fired flexible water tube package boiler, constructed in 1999, with a maximum heat input of 9.0 MMBtu per hour, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc), because the boiler has a maximum heat input capacity of less than 10 MMBtu per hour.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (d) The four (4) mask washers and the four (4) parts washers (insignificant activities) at this source are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.460 through 63.468, Subpart T) because none of these units use a halogenated HAP cleaning solvent.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted Preventive Maintenance Plans (PMPs) on August 25, 2000 for Booths A, B, D, & E, the robot paint spray system, and the Small Parts Line. These PMPs have been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to the requirements of this rule. The total usage of VOC in the robot paint spray system, the Small Parts line, and the robot paint conveyor system shall not exceed 138.07 tons per twelve (12) consecutive month period. Also, VOC usage in the co-extrusion lines shall not exceed 24.9 tons per twelve (12) consecutive month period. These usage limits combined with the potential VOC emissions from the other emission units at this source will limit VOC emissions from the entire source to less than 250 tons per year. Therefore, the requirements of this rule do not apply. This type of operation is not one of the 28 listed source categories under 326 IAC 2-2

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with the Maximum Achievable Control Technology (MACT). This rule does not apply to facilities that have been constructed prior to the rule applicability date of July 27, 1997. Therefore, this rule does not apply to the paint spray booths identified as Booths A, B, D, and E, Mask Washer #1, the eight (8) co-extrusion lines, and the two (2) flockers, each constructed in 1989. The robot paint spray system, the Small Parts Booth, and the mask washers identified as Mask Washer #5, Mask Washer #6, and Mask Washer #7, all constructed in 1999, each has potential single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively. Therefore, these units are not subject to the requirements of this rule. The robot paint conveyor system, constructed in 2001, has potential single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively, therefore, it is not subject to the requirements of this rule.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), particulate matter (PM) emissions from 9.0 million BTU per hour boiler shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.
Q = 9.0 MMBtu/hr

Based on the above equation, PM emissions would be limited to 0.62 lb/MMBtu heat input. However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the more stringent limit applies and PM emissions from the 9.0 MMBtu per hour boiler shall not exceed 0.6 lb/MMBtu heat input.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to CP 133-8608-00019, issued on October 6, 1997, the particulate matter (PM) from each of the robot paint spray system and the Small Parts Booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The closed loop internal mix system and water wash system shall be in operation at all times the Prime coat booth, the Base coat booth, the Clear coat booth, and the Small Parts Booth are in operation, in order to comply with this limit.

- (b) The particulate matter (PM) from each of the Old Paint Room spray booths, identified as Booths A, B, D, and E shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The closed loop internal mix system and water wash system shall be in operation at all times the spray booths identified as Booths A, B, D, and E are in operation, in order to comply with this limit.

- (c) Pursuant to Significant Source Modification 133-14228-00019, pending with the OAQ, the particulate matter (PM) from the primer coat, base coat, and the clear coat spray booths of robot paint conveyor system shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The closed loop internal mix system and a water wash system shall be in operation at all times the primer coat, base coat, and the clear coat spray booths of the robot paint conveyor system are in operation, in order to comply with this limit.

- (d) The particulate matter (PM) from each of the two (2) flockers shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Compliance with this limit shall be demonstrated through overspray observations and inspections of the particulate matter emissions from the stacks.

- (e) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pound per hour. Therefore, PM emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, which are insignificant activities shall not exceed 0.551 pound per hour.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

This source is not subject to 326 IAC 8-2-2. The spray booths in the Old Paint Room and the New Paint Room only coat plastic automobile trim and do not assemble or coat automobile bodies, therefore, the requirements of 326 IAC 8-2-2 do not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

For facilities constructed after November 1, 1980 and before July 1, 1990, this rule applies if potential VOC emissions are equal to or greater than 25 tons per year and if metal parts or products which fall under the Standard Industrial Classification (SIC) Code of major groups #33 through #39 are coated. The co-extrusion lines, all constructed in 1989, are not subject to the requirements of this rule because the total usage of VOC in the eight (8) lines shall be limited to less than 25 tons per year so that the requirements of this rule and 326 IAC 8-1-6 do not apply (see below). All other coating facilities at this source coat only plastic parts and are therefore not subject to this rule.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of greater than or equal to 25 tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Each of the mask washers, identified as Mask Washer #1, Mask Washer #5, Mask Washer #6, and Mask Washer #7, have potential VOC emissions of less than 25 tons per year and are regulated by 326 IAC 8-3-2 and 326 IAC 8-3-5, therefore, they are not subject to the requirements of this rule. The co-extrusion lines, all constructed in 1989, are not subject to the requirements of this rule because the total usage of VOC in the eight (8) lines shall be limited to less than 25 tons per year. The two (2) flockers are not subject to the requirements of this rule because potential VOC emissions are less than 25 tons per year.

Pursuant to CP-133-5802-00019, issued October 7, 1996, the best available control technology (BACT) for the spray coating of plastic automobile trim in Booths A, B, D, and E shall be the use of a high volume low pressure (HVLP) spray gun with a closed-loop internal mix manifold system at all times during which this process is operated. The total amount of volatile organic compounds (VOC) delivered to the applicators shall not exceed 34.2 tons per twelve (12) consecutive month period.

Pursuant to CP-133-8608-00019, issued October 6, 1997, the best available control technology (BACT) for the two (2) paint lines (the robot paint spray system and the Small Parts Line) shall be the use of: (a) a high volume low pressure (HVLP) spray application system with a closed loop internal mix manifold system; and (b) a water wash system for overspray control, consisting of a water fall and water pan, at all times during which the robot paint spray system and the Small Parts Paint Line are in operation. The total amount of VOC delivered to the applicators of the robot paint spray system and the Small Parts Line shall not exceed 63.6 tons per twelve (12) consecutive month period.

Pursuant to Significant Source Modification No. 133-14228-00019, pending with the OAQ, the operation of the robot paint conveyor system without the use of add-on controls and with the following work practice and emission limitation will satisfy the BACT requirements:

- (a) The coatings applied in each of the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall be applied using High Volume Low Pressure (HVLP) Spray Application guns.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b) The total usage of VOC in the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall not exceed 97.85 tons per twelve (12) consecutive month period.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The four (4) mask washers are subject to the requirements of this rule. Each of the mask washers satisfies the definition of a cold cleaner degreaser pursuant to 326 IAC 1-2-18.5. They are used to clean masks used in the surface coating operations.

Pursuant to 326 IAC 8-3-1(a)(2), Mask Washer #1, constructed in 1989, and Mask Washer #5, Mask Washer #6, and Mask Washer #7, all constructed in 1999, are subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation) since they were constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2 the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-1(b)(2), Mask Washer #5, Mask Washer #6, and Mask Washer #7, all constructed in 1999, are subject to the requirements of 326 IAC 8-3-5 since they were constructed after July 1, 1990. Mask Washer #1, constructed in 1989, is not subject to the requirements of 326 IAC 8-3-5 since it was constructed prior to July 1, 1990. Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) The solvent is agitated; or
 - (3) The solvent is heated.

- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

- (a) Close the cover whenever articles are not being handled in the degreaser.
- (b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

The four (4) parts washers, which are insignificant activities constructed in 2001, are also subject to the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 since they were constructed after January 1, 1980 and July 1, 1990. However, since the solvent used in each of the four (4) parts washers has a solvent volatility of less than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), the source is not required to equip these degreasers with a control device pursuant to 326 IAC 8-3-5(a)(5).

Testing Requirements

Testing is not required for the spray booths identified as Booths A, B, D, and E, the primer coat booth, the base coat booth, and the clear coat booth of the robot paint spray system, the Small Parts Paint Line, the primer coat booth, the base coat booth, and the clear coat booth of the robot paint conveyor operation, and the eight (8) co-extruders because compliance with the VOC emission limits can be demonstrated through record keeping and reporting.

Testing on the two (2) flockers and the four (4) mask washers is not required because they do not meet any of the criteria which would require a stack test.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray booths identified as Booths A, B, D, and E have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash system. To monitor the performance of the water wash system, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs OPA-1, OPA-2, OPB-1, OPD-1, OPD-2, OPE-1, OPE-2, and OPE-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- These monitoring conditions are necessary because the water wash system for each of the spray booths identified as Booths A, B, D, and E must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).
2. The primer coat booth, the base coat booth, and the clear coat booth of the robot paint spray system and the Small Parts Booth have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash system. To monitor the performance of the water wash system, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs NPP-1, NPP-2, NPB-1, NPB-2, NPB-3, NPC-1, NPC-2, NPS-1, and NPS-2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the water wash system for the primer coat booth, the base coat booth, and the clear coat booth of the robot paint spray system and the Small Parts Booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- 3. The robot paint conveyor system primer coat spray booth, base coat spray booth, and clear coat spray booth have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash system. To monitor the performance of the water wash system, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack ID #2, #5, #6, and #9) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the water wash system for the robot paint conveyor system spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- 4. The two (2) flockers have applicable compliance monitoring conditions as specified below:

- (a) To demonstrate compliance with condition D.3.2, weekly observations shall be made of the overspray from each of the two (2) flocker stacks (Stack ID F1 and F4) while one or more of the flockers are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the adhesive emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary to ensure compliance of the two (2) flockers with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this plastic automotive trim molding and surface coating operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T133-12660-00019**.

Appendix A: Emission Calculations Summary

Company Name: H.A. Parts Products of Indiana Company
 Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
 Operating Permit No.: T133-12660
 Pit ID: 133-00019
 Reviewer: Trish Earls
 Date: July 16, 2001

Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Surface Coating Old Paint Room	Surface Coating New Paint Room	Mask Washers New and Old Paint Rooms	Flocking and Co-Extrusion	New Robot Line	Natural Gas Combustion	TOTAL**
PM	17.43	13.27	0.00	3.35	54.70	0.12	88.87
PM10	17.43	13.27	0.00	3.35	54.70	0.47	89.22
SO2	0.00	0.00	0.00	0.00	0.00	0.04	0.04
NOx	0.00	0.00	0.00	0.00	0.00	6.13	6.13
VOC	33.83	62.67	37.50	46.73	97.85	0.34	278.92
CO	0.00	0.00	0.00	0.00	0.00	5.15	5.15
total HAPs	11.58	15.63	37.50	41.01	18.97	0.12	124.81
worst case single HAP	(Toluene) 6.86	(Toluene) 6.89	(Toluene) 37.50	(MEK) 22.48	(Toluene) 6.59	(Hexane) 0.11	(Toluene) 59.49

**Total emissions based on rated capacity at 8,760 hours/year.

Controlled Emissions (tons/year)

Emissions Generating Activity

Pollutant	Surface Coating Old Paint Room	Surface Coating New Paint Room	Mask Washers New and Old Paint Rooms	Flocking and Co-Extrusion	New Robot Line	Natural Gas Combustion	TOTAL**
PM	0.17	0.09	0.00	3.35	0.55	0.12	4.28
PM10	0.17	0.09	0.00	3.35	0.55	0.47	4.63
SO2	0.00	0.00	0.00	0.00	0.00	0.04	0.04
NOx	0.00	0.00	0.00	0.00	0.00	6.13	6.13
VOC	33.83	40.22	37.50	39.79	97.85	0.34	249.53
CO	0.00	0.00	0.00	0.00	0.00	5.15	5.15
total HAPs	11.58	10.04	37.50	34.98	18.97	0.12	113.19
worst case single HAP	(Toluene) 6.86	(Toluene) 4.43	(Toluene) 37.50	(MEK) 17.78	(Toluene) 6.59	(Hexane) 0.11	(Toluene) 59.49

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
Plt ID: 133-00019
Reviewer: Trish Earls
Date: July 16, 2001

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
Old Plant Paint Lines																		
Palazzo Red FG25522	Coating Booth A	8.17	64.95%	0.00%	64.95%	0.00%	35.05%	0.0150	20.00	5.3	5.31	1.59	38.21	6.97	3.39	151.40	10.0%	
Garden Green FG27222	Coating Booth A	8.03	66.41%	0.00%	66.41%	0.00%	33.59%	0.0150	20.00	5.3	5.33	1.60	38.40	7.01	3.19	158.76	10.0%	
Canal Blue FG27221	Coating Booth A	7.94	69.07%	0.00%	69.07%	0.00%	30.93%	0.0150	20.00	5.5	5.48	1.65	39.49	7.21	2.90	177.31	10.0%	
Copper Orange FG24226	Coating Booth A	7.92	68.79%	0.00%	68.79%	0.00%	31.21%	0.0150	20.00	5.4	5.45	1.63	39.23	7.16	2.92	174.56	10.0%	
Bright Silver FG24207	Coating Booth A	8.07	70.33%	0.00%	70.33%	0.00%	29.67%	0.0150	20.00	5.7	5.68	1.70	40.86	7.46	2.83	191.29	10.0%	
Ebony Black FG26072	Coating Booth A	8.09	68.78%	0.00%	68.78%	0.00%	31.22%	0.0150	20.00	5.6	5.56	1.67	40.06	7.31	2.99	178.23	10.0%	
Fawn Brown FG27287	Coating Booth A	8.01	67.28%	0.00%	67.28%	0.00%	32.72%	0.0150	20.00	5.4	5.39	1.62	38.80	7.08	3.10	164.70	10.0%	
Titan Gray FG27344	Coating Booth A	7.92	68.98%	0.00%	68.98%	0.00%	31.02%	0.0150	20.00	5.5	5.46	1.64	39.34	7.18	2.91	176.12	10.0%	
Zephyr Green FG25655	Coating Booth A	8.01	69.30%	0.00%	69.30%	0.00%	37.70%	0.0150	20.00	5.6	5.55	1.67	39.97	7.29	2.91	147.24	10.0%	
Alpine White FG27008	Coating Booth A	9.90	47.31%	0.00%	47.31%	0.00%	52.69%	0.0150	20.00	4.7	4.68	1.41	33.72	6.15	6.17	88.89	10.0%	
Emerald Green FG21270	Coating Booth A	7.95	67.56%	0.00%	67.56%	0.00%	32.44%	0.0150	20.00	5.4	5.37	1.61	38.67	7.06	3.05	165.57	10.0%	
Clear Coat FG14217	Coating Booth A	8.09	61.66%	0.00%	61.66%	0.00%	38.34%	0.0087	20.00	5.0	4.99	0.87	20.83	3.80	2.13	130.11	10.0%	
												2.57	61.70	11.26	8.30			
Isuzu Black Mask FG27444	Coating Booth B	8.33	58.38%	0.00%	58.38%	0.00%	41.62%	0.0021	20.00	4.9	4.86	0.20	4.90	0.89	0.57	116.84	10.0%	
												0.20	4.90	0.89	0.57			
Green Mica FG26425	Coating Booth D	7.99	64.76%	0.00%	64.76%	0.00%	35.24%	0.0052	40.00	5.2	5.17	1.08	25.83	4.71	0.64	19.58	75.0%	
Cream White FG 26426	Coating Booth D	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0052	40.00	4.0	3.96	0.82	19.77	3.61	1.37	8.77	75.0%	
Black Mica FG 23065	Coating Booth D	7.78	66.81%	0.00%	66.81%	0.00%	33.19%	0.0052	40.00	5.2	5.20	1.08	25.95	4.74	0.59	20.88	75.0%	
Green Gray FG 26427	Coating Booth D	7.95	67.35%	0.00%	67.35%	0.00%	32.65%	0.0052	40.00	5.4	5.35	1.11	26.73	4.88	0.59	21.87	75.0%	
Red Mica FG 25392	Coating Booth D	7.83	67.43%	0.00%	67.43%	0.00%	32.57%	0.0052	40.00	5.3	5.28	1.10	26.36	4.81	0.58	21.61	75.0%	
Dark Blue FG 22215	Coating Booth D	8.04	64.09%	0.00%	64.09%	0.00%	35.91%	0.0052	40.00	5.2	5.15	1.07	25.72	4.69	0.66	19.13	75.0%	
Rio Red FG 23291	Coating Booth D	8.34	52.46%	0.00%	52.46%	0.00%	47.54%	0.0052	40.00	4.4	4.38	0.91	21.84	3.99	0.90	12.27	75.0%	
Warm Gray Opal FG 26445	Coating Booth D	7.99	65.45%	0.00%	65.45%	0.00%	34.55%	0.0052	40.00	5.2	5.23	1.09	26.11	4.76	0.63	20.18	75.0%	
Slate Met 26G FG21911	Coating Booth D	8.00	65.24%	0.00%	65.24%	0.00%	34.76%	0.0052	40.00	5.2	5.22	1.09	26.05	4.75	0.63	20.02	75.0%	
Bright Silver FG28757	Coating Booth D	7.88	65.86%	0.00%	65.86%	0.00%	34.14%	0.0052	40.00	5.2	5.19	1.08	25.91	4.73	0.61	20.27	75.0%	
Clear Coat FG 14217	Coating Booth D	8.09	61.66%	0.00%	61.66%	0.00%	38.34%	0.0043	40.00	5.0	4.99	0.86	20.59	3.76	0.58	17.35	75.0%	
Primer 117UKD FG23404	Coating Booth D	8.07	74.81%	0.00%	74.81%	0.00%	38.34%	0.0044	40.00	6.0	6.04	1.06	25.50	4.65	0.39	21.00	75.0%	
												3.03	72.82	13.29	2.34			
Palazzo Red FG25522	Coating Booth E	8.17	64.95%	0.00%	64.95%	0.00%	35.05%	0.0095	24.00	5.3	5.31	1.21	29.04	5.30	2.57	151.40	10.0%	
Garden Green FG27222	Coating Booth E	8.03	66.41%	0.00%	66.41%	0.00%	33.59%	0.0095	24.00	5.3	5.33	1.22	29.18	5.33	2.42	158.76	10.0%	
Canal Blue FG27221	Coating Booth E	7.94	69.07%	0.00%	69.07%	0.00%	30.93%	0.0095	24.00	5.5	5.48	1.25	30.01	5.48	2.21	177.31	10.0%	
Copper Orange FG24226	Coating Booth E	7.92	68.79%	0.00%	68.79%	0.00%	31.21%	0.0095	24.00	5.4	5.45	1.24	29.81	5.44	2.22	174.56	10.0%	
Bright Silver FG24207	Coating Booth E	8.07	70.33%	0.00%	70.33%	0.00%	29.67%	0.0095	24.00	5.7	5.68	1.29	31.06	5.67	2.15	191.29	10.0%	
Ebony Black FG26072	Coating Booth E	8.09	68.78%	0.00%	68.78%	0.00%	31.22%	0.0095	24.00	5.6	5.56	1.27	30.45	5.56	2.27	178.23	10.0%	
Fawn Brown FG27287	Coating Booth E	8.01	67.28%	0.00%	67.28%	0.00%	32.72%	0.0095	24.00	5.4	5.39	1.23	29.49	5.38	2.36	164.70	10.0%	
Titan Gray FG27344	Coating Booth E	7.92	68.98%	0.00%	68.98%	0.00%	31.02%	0.0095	24.00	5.5	5.46	1.25	29.89	5.46	2.21	176.12	10.0%	
Zephyr Green FG25655	Coating Booth E	8.01	69.30%	0.00%	69.30%	0.00%	37.70%	0.0095	24.00	5.6	5.55	1.27	30.37	5.54	2.21	147.24	10.0%	
Alpine White FG27008	Coating Booth E	9.90	47.31%	0.00%	47.31%	0.00%	52.69%	0.0095	24.00	4.7	4.68	1.07	25.63	4.68	4.69	88.89	10.0%	
Emerald Green FG21270	Coating Booth E	7.95	67.56%	0.00%	67.56%	0.00%	32.44%	0.0095	24.00	5.4	5.37	1.22	29.39	5.36	2.32	165.57	10.0%	
Clear Coat FG14217	Coating Booth E	8.09	61.66%	0.00%	61.66%	0.00%	38.34%	0.0052	24.00	5.0	4.99	0.62	14.94	2.73	1.53	130.11	10.0%	
												1.92	46.00	8.39	6.21			
Old Plant Mask Washer																		
Toluene/Acetone Wash	Mask Washer	7.04	100.00%	32.90%	67.10%	0.00%	0.00%	1.0000	0.94	4.7	4.72	4.43	106.29	19.40	0.00	NA	100.0%	
Total State Potential Emissions:												12.15	291.70	53.24	17.43			
Federal Potential Emissions (controlled):																		
Total Federal Potential Emissions:										Control Efficiency:		Controlled	Controlled	Controlled	Controlled			
										Material Usage Limitation	PM	VOC lbs per Hour	VOC lbs per Day	VOC tons per Year	PM tons/yr			
										0.00%	99.00%	12.15	291.70	53.24	0.17			

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Material	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % MEK	Weight % Toluene	Weight % Isopropyl benzene	Weight % Methanol	Weight % Glycol Ether	Weight % 1,4 Dioxane	Weight % Formaldehyde	Weight % Carbon Tetrachloride
Old Plant Paint Lines														
Palazzo Red FG25522	Coating Booth A	8.17	0.0150	20.00	1.39%	2.28%	1.01%	0.09%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%
Garden Green FG27222	Coating Booth A	8.03	0.0150	20.00	1.07%	1.19%	0.59%	0.10%	0.13%	0.00%	0.00%	0.00%	0.00%	0.00%
Canal Blue FG27221	Coating Booth A	7.94	0.0150	20.00	1.15%	1.37%	0.65%	0.09%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%
Copper Orange FG24226	Coating Booth A	7.92	0.0150	20.00	1.05%	1.53%	0.73%	0.09%	0.17%	0.00%	0.00%	0.00%	0.00%	0.00%
Bright Silver FG24207	Coating Booth A	8.07	0.0150	20.00	0.90%	0.34%	0.21%	2.85%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Ebony Black FG26072	Coating Booth A	8.09	0.0150	20.00	2.59%	4.13%	1.08%	12.50%	0.02%	0.01%	0.00%	0.00%	0.00%	0.00%
Fawn Brown FG27287	Coating Booth A	8.01	0.0150	20.00	1.12%	1.75%	0.81%	0.09%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%
Titan Gray FG27344	Coating Booth A	7.92	0.0150	20.00	1.05%	2.20%	0.59%	0.09%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%
Zephyr Green FG25655	Coating Booth A	8.01	0.0150	20.00	1.05%	1.04%	0.51%	0.09%	0.17%	0.00%	0.00%	0.00%	0.00%	0.00%
Alpine White FG27008	Coating Booth A	9.90	0.0150	20.00	2.48%	2.41%	0.13%	8.10%	0.02%	0.01%	0.00%	0.00%	0.00%	0.00%
Emerald Green FG21270	Coating Booth A	7.95	0.0150	20.00	1.11%	0.16%	0.75%	0.10%	0.13%	0.00%	0.00%	0.00%	0.00%	0.00%
Clear Coat FG14217	Coating Booth A	8.09	0.0087	20.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Isuzu Black Mask FG27444	Coating Booth B	8.33	0.0021	20.00	2.12%	1.64%	20.84%	2.49%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Green Mica FG26425	Coating Booth D	7.99	0.0052	40.00	5.74%	1.93%	0.92%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Cream White FG 26426	Coating Booth D	9.96	0.0052	40.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Black Mica FG 23065	Coating Booth D	7.78	0.0052	40.00	6.07%	1.41%	0.68%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Green Gray FG 26427	Coating Booth D	7.95	0.0052	40.00	5.29%	2.56%	1.19%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Red Mica FG 25392	Coating Booth D	7.83	0.0052	40.00	5.81%	1.29%	0.62%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Dark Blue FG 22215	Coating Booth D	8.04	0.0052	40.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rio Red FG 23291	Coating Booth D	8.34	0.0052	40.00	7.02%	3.77%	1.73%	0.14%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%
Warm Gray Opal FG 26445	Coating Booth D	7.99	0.0052	40.00	5.66%	0.91%	0.46%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Slate Met 26G FG21911	Coating Booth D	8.00	0.0052	40.00	2.16%	0.93%	0.46%	0.09%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%
Bright Silver FG28757	Coating Booth D	7.88	0.0052	40.00	5.24%	1.25%	0.14%	4.39%	0.00%	0.06%	0.00%	0.00%	0.00%	0.00%
Clear Coat FG 14217	Coating Booth D	8.09	0.0043	40.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Primer 117UKD FG23404	Coating Booth D	8.07	0.0044	40.00	3.66%	0.51%	12.70%	42.95%	0.13%	0.00%	4.82%	0.28%	0.06%	0.05%
Palazzo Red FG25522	Coating Booth E	8.17	0.0095	24.00	1.39%	2.28%	1.01%	0.09%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%
Garden Green FG27222														

Appendix A: HAP Emission Calculations (Page 2 of 2)

Company Name: H.A. Parts Products of Indiana Company
 Address City IN Zip: 2200 State Route 240 East, Greencastle, Indiana 46135
 Operating Permit No.: T133-12660
 Plt ID: 133-00019
 Reviewer: Trish Earls
 Date: July 16, 2001

Material	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Isopropylbenzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	1,4 Dioxane Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)
Old Plant Paint Lines														
Palazzo Red FG25522	Coating Booth A	8.17	0.0150	20.00	0.15	0.24	0.11	0.01	0.02	0.00	0.00	0.00	0.00	0.00
Garden Green FG27222	Coating Booth A	8.03	0.0150	20.00	0.11	0.13	0.06	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Canal Blue FG27221	Coating Booth A	7.94	0.0150	20.00	0.12	0.14	0.07	0.01	0.02	0.00	0.00	0.00	0.00	0.00
Copper Orange FG24226	Coating Booth A	7.92	0.0150	20.00	0.11	0.16	0.08	0.01	0.02	0.00	0.00	0.00	0.00	0.00
Bright Silver FG24207	Coating Booth A	8.07	0.0150	20.00	0.10	0.04	0.02	0.30	0.00	0.00	0.00	0.00	0.00	0.00
Ebony Black FG26072	Coating Booth A	8.09	0.0150	20.00	0.28	0.44	0.11	1.33	0.00	0.00	0.00	0.00	0.00	0.00
Fawn Brown FG27287	Coating Booth A	8.01	0.0150	20.00	0.12	0.18	0.09	0.01	0.02	0.00	0.00	0.00	0.00	0.00
Titan Gray FG27344	Coating Booth A	7.92	0.0150	20.00	0.11	0.23	0.06	0.01	0.02	0.00	0.00	0.00	0.00	0.00
Zephyr Green FG25655	Coating Booth A	8.01	0.0150	20.00	0.11	0.11	0.05	0.01	0.02	0.00	0.00	0.00	0.00	0.00
Alpine White FG27008	Coating Booth A	9.90	0.0150	20.00	0.32	0.31	0.02	1.05	0.00	0.00	0.00	0.00	0.00	0.00
Emerald Green FG21270	Coating Booth A	7.95	0.0150	20.00	0.12	0.02	0.08	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Clear Coat FG14217	Coating Booth A	8.09	0.0087	20.00	0.08	0.00	0.00	0.55	0.00	0.00	0.00	0.00	0.00	0.00
Isuzu Black Mask FG27444	Coating Booth B	8.33	0.0021	20.00	0.03	0.03	0.32	0.04	0.00	0.00	0.00	0.00	0.00	0.00
Green Mica FG26425	Coating Booth D	7.99	0.0052	40.00	0.42	0.14	0.07	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Cream White FG 26426	Coating Booth D	9.96	0.0052	40.00	0.07	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Black Mica FG 23065	Coating Booth D	7.78	0.0052	40.00	0.43	0.10	0.05	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Green Gray FG 26427	Coating Booth D	7.95	0.0052	40.00	0.38	0.19	0.09	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Red Mica FG 25392	Coating Booth D	7.83	0.0052	40.00	0.41	0.09	0.04	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Dark Blue FG 22215	Coating Booth D	8.04	0.0052	40.00	0.08	0.48	0.07	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Rio Red FG 23291	Coating Booth D	8.34	0.0052	40.00	0.53	0.29	0.13	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Warm Gray Opal FG 26445	Coating Booth D	7.99	0.0052	40.00	0.41	0.07	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Slate Met 26G FG21911	Coating Booth D	8.00	0.0052	40.00	0.16	0.07	0.03	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Bright Silver FG28757	Coating Booth D	7.88	0.0052	40.00	0.38	0.09	0.01	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Clear Coat FG 14217	Coating Booth D	8.09	0.0043	40.00	0.08	0.00	0.00	0.55	0.00	0.00	0.00	0.00	0.00	0.00
Primer 117UKD FG23404	Coating Booth D	8.07	0.0044	40.00	0.23	0.03	0.79	2.67	0.01	0.00	0.30	0.02	0.00	0.00
Palazzo Red FG25522	Coating Booth E	8.17	0.0095	24.00	0.11	0.19	0.08	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Garden Green FG27222	Coating Booth E	8.03	0.0095	24.00	0.09	0.10	0.05	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Canal Blue FG27221	Coating Booth E	7.94	0.0095	24.00	0.09	0.11	0.05	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Copper Orange FG24226	Coating Booth E	7.92	0.0095	24.00	0.08	0.12	0.06	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Bright Silver FG24207	Coating Booth E	8.07	0.0095	24.00	0.07	0.03	0.02	0.23	0.00	0.00	0.00	0.00	0.00	0.00
Ebony Black FG26072	Coating Booth E	8.09	0.0095	24.00	0.21	0.33	0.09	1.01	0.00	0.00	0.00	0.00	0.00	0.00
Fawn Brown FG27287	Coating Booth E	8.01	0.0095	24.00	0.09	0.14	0.06	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Titan Gray FG27344	Coating Booth E	7.92	0.0095	24.00	0.08	0.17	0.05	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Zephyr Green FG25655	Coating Booth E	8.01	0.0095	24.00	0.08	0.08	0.04	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Alpine White FG27008	Coating Booth E	9.90	0.0095	24.00	0.25	0.24	0.01	0.80	0.00	0.00	0.00	0.00	0.00	0.00
Emerald Green FG21270	Coating Booth E	7.95	0.0095	24.00	0.09	0.01	0.06	0.01	0.01	0.00	0.00	0.00	0.00	0.00
Clear Coat FG14217	Coating Booth E	8.09	0.0052	24.00	0.06	0.00	0.00	0.40	0.00	0.00	0.00	0.00	0.00	0.00
Old Plant Mask Washer														
Toluene/Acetone Wash	Mask Washer	7.04	1.0000	0.94	0.00	0.00	0.00	19.40	0.00	0.00	0.00	0.00	0.00	0.00
					1.59	1.31	1.44	26.26	0.05	0.00	0.30	0.02	0.00	0.00

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation

Total HAPs:

30.98

**Appendix A: Emission Calculations
VOC and Particulate
From New Paint Room**

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
Plt ID: 133-00019
Reviewer: Trish Earls
Date: July 16, 2001

State Potential Emissions (uncontrolled):																	
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Prime Booth - New Plant Robot Line																	
Primer 900 FG27245	Prime Booth	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0126	40.00	6.1	6.09	3.07	73.65	13.44	0.99	35.72	75.0%
												3.07	73.65	13.44	0.99		
Base Coat Booth - New Plant Robot Line																	
Green Mica FG 26425	Base Coat Booth	7.99	64.76%	0.00%	64.76%	0.00%	35.24%	0.0259	40.00	5.2	5.17	5.36	128.65	23.48	3.19	19.58	75.0%
Cream White FG 26426	Base Coat Booth	10.00	38.84%	0.00%	38.84%	0.00%	61.16%	0.0259	40.00	3.9	3.88	4.02	96.57	17.62	6.94	8.47	75.0%
Black Mica FG 23065	Base Coat Booth	7.78	66.81%	0.00%	66.81%	0.00%	33.19%	0.0259	40.00	5.2	5.20	5.38	129.24	23.59	2.93	20.88	75.0%
Green Gray FG 26427	Base Coat Booth	7.95	67.35%	0.00%	67.35%	0.00%	32.65%	0.0259	40.00	5.4	5.35	5.55	133.13	24.30	2.94	21.87	75.0%
Red Mica FG 25392	Base Coat Booth	7.83	67.43%	0.00%	67.43%	0.00%	32.57%	0.0259	40.00	5.3	5.28	5.47	131.28	23.96	2.89	21.61	75.0%
Dark Blue FG 22215	Base Coat Booth	8.04	64.09%	0.00%	64.09%	0.00%	35.91%	0.0259	40.00	5.2	5.15	5.34	128.12	23.38	3.28	19.13	75.0%
Rio Red FG 23291	Base Coat Booth	8.34	52.46%	0.00%	52.46%	0.00%	47.54%	0.0259	40.00	4.4	4.38	4.53	108.78	19.85	4.50	12.27	75.0%
Warm Gray Opal FG 26445	Base Coat Booth	8.07	61.61%	0.00%	61.61%	0.00%	38.39%	0.0259	40.00	5.0	4.97	5.15	123.62	22.56	3.51	17.27	75.0%
Slate Met 26G FG21911	Base Coat Booth	8.00	65.24%	0.00%	65.24%	0.00%	34.76%	0.0259	40.00	5.2	5.22	5.41	129.77	23.68	3.15	20.02	75.0%
Bright Silver FG28757	Base Coat Booth	7.88	65.86%	0.00%	65.86%	0.00%	34.14%	0.0259	40.00	5.2	5.19	5.38	129.04	23.55	3.05	20.27	75.0%
												5.55	133.13	24.30	6.94		
Clear Coat Booth - New Plant Robot Line																	
Clear Coat FG 14217	Clear Coat Booth	8.09	61.66%	0.00%	61.66%	0.00%	38.34%	0.0239	40.00	5.0	4.99	4.77	114.45	20.89	3.25	17.35	75.0%
												4.77	114.45	20.89	3.25		
Small Parts Booth - New Plant																	
OBK R/G 562	Small Parts Booth	8.08	63.40%	0.00%	63.40%	0.00%	36.60%	0.0072	25.00	5.1	5.12	0.92	22.13	4.04	2.10	139.97	10.0%
												0.92	22.13	4.04	2.10		
New Plant Mask Washers																	
Toluene/Acetone Wash	Mask Washer (NPM5)	7.04	100.00%	32.90%	67.10%	0.00%	0.00%	1.0000	0.31	4.7	4.72	1.48	35.43	6.47	0.00	NA	100.0%
Toluene/Acetone Wash	Mask Washer (NPM6)	7.04	100.00%	32.90%	67.10%	0.00%	0.00%	1.0000	0.31	4.7	4.72	1.48	35.43	6.47	0.00	NA	100.0%
Toluene/Acetone Wash	Mask Washer (NPM7)	7.04	100.00%	32.90%	67.10%	0.00%	0.00%	1.0000	0.25	4.7	4.72	1.18	28.34	5.17	0.00	NA	100.0%
												4.13	99.20	18.10	0.00		
Total State Potential Emissions:												18.44	442.56	80.77	13.27		
Federal Potential Emissions (controlled):																	
Total Federal Potential Emissions:										Control Efficiency:		Controlled	Controlled	Controlled	Controlled		
										Material Usage Limitation	PM	VOC lbs per Hour	VOC lbs per Day	VOC tons per Year	PM tons/yr		
										64.18%	99.00%	13.32	319.58	58.32	0.09		

Note: At a 64.18% material usage limitation for the spray booths in the new paint room, VOC emissions are limited to 40.59 tons per year for a source wide VOC emission limit of less than 250 tons/yr, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: HAP Emission Calculations (Page 1 of 2)

Company Name: H.A. Parts Products of Indiana Company
 Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
 Operating Permit No.: T133-12660
 Plt ID: 133-00019
 Reviewer: Trish Earls
 Date: July 16, 2001

Material	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Material Usage Limitation	Weight % Xylene	Weight % Ethyl Benzene	Weight % MEK	Weight % Toluene	Weight % Isopropyl benzene	Weight % Glycol Ether	Weight % 1,4 Dioxane	Weight % MIBK
Prime Booth - New Plant Robot Line													
Primer 900 FG27245	Prime Booth	7.88	0.0126	40.00	64.18%	2.72%	6.42%	0.00%	4.69%	0.00%	0.00%	0.00%	0.00%
Base Coat Booth - New Plant Robot Line													
Green Mica FG 26425	Base Coat Booth	7.99	0.0259	40.00	64.18%	5.74%	1.93%	0.92%	0.12%	0.00%	0.00%	0.00%	0.00%
Cream White FG 26426	Base Coat Booth	10.00	0.0259	40.00	64.18%	0.78%	0.04%	0.11%	0.14%	0.00%	0.00%	0.00%	0.00%
Black Mica FG 23065	Base Coat Booth	7.78	0.0259	40.00	64.18%	6.07%	1.41%	0.68%	0.12%	0.00%	0.00%	0.00%	0.00%
Green Gray FG 26427	Base Coat Booth	7.95	0.0259	40.00	64.18%	5.29%	2.56%	1.19%	0.11%	0.00%	0.00%	0.00%	0.00%
Red Mica FG 25392	Base Coat Booth	7.83	0.0259	40.00	64.18%	5.81%	1.29%	0.62%	0.12%	0.00%	0.00%	0.00%	0.00%
Dark Blue FG 22215	Base Coat Booth	8.04	0.0259	40.00	64.18%	1.07%	6.60%	0.96%	0.09%	0.00%	0.00%	0.00%	0.00%
Rio Red FG 23291	Base Coat Booth	8.34	0.0259	40.00	64.18%	7.02%	3.77%	1.73%	0.14%	0.03%	0.00%	0.00%	0.00%
Warm Gray Opal FG 26445	Base Coat Booth	8.07	0.0259	40.00	64.18%	5.66%	0.91%	0.46%	0.11%	0.00%	0.00%	0.00%	0.00%
Slate Met 26G FG21911	Base Coat Booth	8.00	0.0259	40.00	64.18%	2.16%	0.93%	0.46%	0.09%	0.12%	0.00%	0.00%	0.00%
Bright Silver FG28757	Base Coat Booth	7.88	0.0259	40.00	64.18%	5.24%	1.25%	0.14%	4.39%	0.00%	0.06%	0.00%	0.00%
Clear Coat Booth - New Plant Robot Line													
Clear Coat FG 14217	Clear Coat Booth	8.09	0.0239	40.00	64.18%	1.38%	0.00%	0.00%	9.00%	0.00%	0.00%	0.00%	0.00%
Small Parts Booth - New Plant													
OBK R/G 562	Small Parts Booth	8.08	0.0072	25.00	64.18%	7.43%	0.00%	0.00%	23.00%	0.00%	0.00%	0.00%	6.67%
New Plant Mask Washers													
Toluene/Acetone Wash	Mask Washer (NPM5)	7.04	1.0000	0.31	0.00%	0.00%	0.00%	0.00%	67.10%	0.00%	0.00%	0.00%	0.00%
Toluene/Acetone Wash	Mask Washer (NPM6)	7.04	1.0000	0.31	0.00%	0.00%	0.00%	0.00%	67.10%	0.00%	0.00%	0.00%	0.00%
Toluene/Acetone Wash	Mask Washer (NPM7)	7.04	1.0000	0.25	0.00%	0.00%	0.00%	0.00%	67.10%	0.00%	0.00%	0.00%	0.00%

Appendix A: HAP Emission Calculations (Page 2 of 2)

Company Name: H.A. Parts Products of Indiana Company
 Address City IN Zip: 2200 State Route 240 East, Greencastle, Indiana 46135
 Operating Permit No.: T133-12660
 Plt ID: 133-00019
 Reviewer: Trish Earls
 Date: July 16, 2001

Material	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Material Usage Limitation	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Isopropylbenzene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	1,4 Dioxane Emissions (ton/yr)	MIBK Emissions (ton/yr)
Prime Booth - New Plant Robot Line													
Primer 900 FG27245	Prime Booth	7.88	0.0126	40.00	64.18%	0.30	0.72	0.00	0.52	0.00	0.00	0.00	0.00
Base Coat Booth - New Plant Robot Line													
Green Mica FG 26425	Base Coat Booth	7.99	0.0259	40.00	64.18%	1.34	0.45	0.21	0.03	0.00	0.00	0.00	0.00
Cream White FG 26426	Base Coat Booth	10.00	0.0259	40.00	64.18%	0.23	0.01	0.03	0.04	0.00	0.00	0.00	0.00
Black Mica FG 23065	Base Coat Booth	7.78	0.0259	40.00	64.18%	1.38	0.32	0.15	0.03	0.00	0.00	0.00	0.00
Green Gray FG 26427	Base Coat Booth	7.95	0.0259	40.00	64.18%	1.22	0.59	0.27	0.03	0.00	0.00	0.00	0.00
Red Mica FG 25392	Base Coat Booth	7.83	0.0259	40.00	64.18%	1.32	0.29	0.14	0.03	0.00	0.00	0.00	0.00
Dark Blue FG 22215	Base Coat Booth	8.04	0.0259	40.00	64.18%	0.25	1.55	0.22	0.02	0.00	0.00	0.00	0.00
Rio Red FG 23291	Base Coat Booth	8.34	0.0259	40.00	64.18%	1.71	0.92	0.42	0.03	0.01	0.00	0.00	0.00
Warm Gray Opal FG 26445	Base Coat Booth	8.07	0.0259	40.00	64.18%	1.33	0.21	0.11	0.03	0.00	0.00	0.00	0.00
Slate Met 26G FG21911	Base Coat Booth	8.00	0.0259	40.00	64.18%	0.50	0.22	0.11	0.02	0.03	0.00	0.00	0.00
Bright Silver FG28757	Base Coat Booth	7.88	0.0259	40.00	64.18%	1.20	0.29	0.03	1.01	0.00	0.01	0.00	0.00
Clear Coat Booth - New Plant Robot Line													
Clear Coat FG 14217	Clear Coat Booth	8.09	0.0239	40.00	64.18%	0.30	0.00	0.00	1.96	0.00	0.00	0.00	0.00
Small Parts Booth - New Plant													
OBK R/G 562	Small Parts Booth	8.08	0.0072	25.00	64.18%	0.30	0.00	0.00	0.94	0.00	0.00	0.00	0.27
New Plant Mask Washers													
Toluene/Acetone Wash	Mask Washer (NPM5)	7.04	1.0000	0.31	0.00%	0.00	0.00	0.00	6.47	0.00	0.00	0.00	0.00
Toluene/Acetone Wash	Mask Washer (NPM6)	7.04	1.0000	0.31	0.00%	0.00	0.00	0.00	6.47	0.00	0.00	0.00	0.00
Toluene/Acetone Wash	Mask Washer (NPM7)	7.04	1.0000	0.25	0.00%	0.00	0.00	0.00	5.17	0.00	0.00	0.00	0.00
						2.61	2.26	0.42	22.53	0.03	0.01	0.00	0.27

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation

Total HAPs: **28.14**

**Appendix A: Emission Calculations
VOC and Particulate
From Flocking and Co-Extrusion**

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
Plt ID: 133-00019
Reviewer: Trish Earls
Date: September 22, 2000

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
Flocking																		
Adhesive, MIBK, Catalyst	FL101, FL112	7.38	80.00%	0.00%	80.00%	0.00%	20.00%	4.25 lbs/hr		5.9	5.90	3.40	81.60	14.89	3.35	295.20	10.0%	
Co-Extrusion																		
A-1689-B Straight Adhesive	CX113 and CX109	7.04	94.00%	0.00%	94.00%	0.00%	6.00%	1.0000	0.29	6.6	6.62	1.92	45.97	8.39	0.00	110.29	100.0%	
A-1689-B/MEK Mix	All Eight Extruders	6.76	98.50%	0.00%	98.50%	0.00%	1.50%	1.0000	0.80	6.7	6.66	5.35	128.48	23.45	0.00	443.91	100.0%	
Total State Potential Emissions:												10.67	256.05	46.73	3.35			
Federal Potential Emissions (controlled):																		
Total Federal Potential Emissions:										Control Efficiency:		Controlled	Controlled	Controlled	Controlled			
										Material Usage Limitation for Co-Extrusion	PM	VOC lbs per Hour	VOC lbs per Day	VOC tons per Year	PM tons/yr			
										78.21%	0.00%	9.08	218.04	39.79	3.35			

Note: VOC emissions from co-extrusion will be limited to less than 25 tons per year so that the requirements of 326 IAC 8-1-6 do not apply.

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emission Calculations HAP Emissions From Flocking and Co-Extrusion

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
Pit ID: 133-00019
Reviewer: Trish Earls
Date: July 16, 2001

State Potential Emissions (uncontrolled):														
Material (as applied)	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % MIBK	Weight % Toluene	Weight % Methyl Methacrylate	Weight % Formaldehyde	MEK Emissions ton/yr	MIBK Emissions ton/yr	Toluene Emissions ton/yr	Methyl Methacrylate Emissions ton/yr	Formaldehyde Emissions ton/yr
Flocking														
Adhesive, MIBK, Catalyst	FL101, FL112	7.38	4.25 lbs/hr		4.86%	65.43%	1.29%	0.00%	0.00%	0.90	12.18	0.24	0.00	0.00
Co-Extrusion														
A-1689-B Straight Adhesive	CX113 and CX109	7.04	1.0000	0.29	25.00%	0.00%	40.00%	1.00%	0.10%	2.23	0.00	3.57	0.09	0.01
A-1689-B/MEK Mix	All Eight Extruders	6.76	1.0000	0.80	81.25%	0.00%	10.00%	0.25%	0.03%	19.34	0.00	2.38	0.06	0.01

Total State Potential Emissions:

22.48	12.18	6.19	0.15	0.01
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Total HAPs: **41.01**

Material Usage Limitation				
78.21%	17.78	12.18	4.89	0.12

Total Limited HAPs: **34.98**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
Pit ID: 133-00019
Reviewer: Trish Earls
Date: July 16, 2001

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
New Robot Paint Line - Garnish FR Door R/H - L/H																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0134	59.00	6.1	6.09	4.81	115.53	21.08	3.10	53.58	50.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0230	59.00	4.0	3.96	5.37	128.97	23.54	17.83	13.15	50.0%	
Green Gray FG 26427	Base	7.95	67.35%	0.00%	67.35%	0.00%	32.65%	0.0288	59.00	5.4	5.35	9.10	218.35	39.85	9.66	32.80	50.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0272	59.00	5.0	4.99	8.01	192.25	35.09	10.89	26.07	50.0%	
														96.02	31.82			
New Robot Paint Line - Garnish RR Door R/H - L/H																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0112	69.00	6.1	6.09	4.71	112.93	20.61	3.03	53.58	50.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0198	69.00	4.0	3.96	5.41	129.85	23.70	17.95	13.15	50.0%	
Red Mica FG 25392	Base	7.83	67.43%	0.00%	67.43%	0.00%	32.57%	0.0251	69.00	5.3	5.28	9.14	219.46	40.05	9.67	32.42	50.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0231	69.00	5.0	4.99	7.96	190.94	34.85	10.82	26.07	50.0%	
														95.51	31.80			
New Robot Paint Line - Garnish RR Fender R/H - L/H																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0268	30.00	6.1	6.09	4.90	117.49	21.44	3.15	53.58	50.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0462	30.00	4.0	3.96	5.49	131.73	24.04	18.21	13.15	50.0%	
Red Mica FG 25392	Base	7.83	67.43%	0.00%	67.43%	0.00%	32.57%	0.0587	30.00	5.3	5.28	9.30	223.14	40.72	9.84	32.42	50.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0544	30.00	5.0	4.99	8.15	195.51	35.68	11.07	26.07	50.0%	
														97.85	32.44			
New Robot Paint Line - Side Sill R/H - L/H																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0134	63.00	6.1	6.09	5.14	123.37	22.51	5.63	178.59	15.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0217	63.00	4.0	3.96	5.41	129.93	23.71	30.54	43.83	15.0%	
Red Mica FG 25392	Base	7.83	67.43%	0.00%	67.43%	0.00%	32.57%	0.0276	63.00	5.3	5.28	9.18	220.33	40.21	16.51	108.07	15.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0255	63.00	5.0	4.99	8.02	192.45	35.12	18.53	86.88	15.0%	
														97.85	54.70			
New Robot Paint Line - Garnish FR FF R/H - L/H																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0045	127.00	6.1	6.09	3.48	83.52	15.24	2.24	53.58	50.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0108	127.00	4.0	3.96	5.43	130.36	23.79	18.02	13.15	50.0%	
Green Gray FG 26427	Base	7.95	67.35%	0.00%	67.35%	0.00%	32.65%	0.0136	127.00	5.4	5.35	9.25	221.95	40.51	9.82	32.80	50.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0119	127.00	5.0	4.99	7.54	181.05	33.04	10.26	26.07	50.0%	
														88.79	30.52			
New Robot Paint Line - Tailgate																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0179	44.00	6.1	6.09	4.80	115.09	21.00	5.25	178.59	15.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0308	44.00	4.0	3.96	5.37	128.80	23.51	30.27	43.83	15.0%	
Red Mica FG 25392	Base	7.83	67.43%	0.00%	67.43%	0.00%	32.57%	0.0392	44.00	5.3	5.28	9.11	218.56	39.89	16.38	108.07	15.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0367	44.00	5.0	4.99	8.06	193.45	35.30	18.63	86.88	15.0%	
														96.20	54.15			
New Robot Paint Line - Fuel Cap Cover																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0018	354.00	6.1	6.09	3.88	93.12	16.99	2.50	53.58	50.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0039	354.00	4.0	3.96	5.47	131.22	23.95	18.14	13.15	50.0%	
Red Mica FG 25392	Base	7.83	67.43%	0.00%	67.43%	0.00%	32.57%	0.0049	354.00	5.3	5.28	9.16	219.80	40.11	9.69	32.42	50.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0034	354.00	5.0	4.99	6.01	144.19	26.31	8.17	26.07	50.0%	
														83.42	28.81			
New Robot Paint Line - Radiator Grille																		
L. Gray FG 27245	Primer	7.88	77.27%	0.00%	77.27%	0.00%	22.73%	0.0045	178.00	6.1	6.09	4.88	117.05	21.36	5.66	267.88	10.0%	
Cream White FG 26426	Base	9.96	39.76%	0.00%	39.76%	0.00%	60.24%	0.0077	178.00	4.0	3.96	5.43	130.26	23.77	32.42	65.74	10.0%	
Green Gray FG 26427	Base	7.95	67.35%	0.00%	67.35%	0.00%	32.65%	0.0096	178.00	5.4	5.35	9.15	219.59	40.07	17.48	163.99	10.0%	
Clear Coat FG 14217	Clear	8.09	61.70%	0.00%	61.70%	0.00%	38.30%	0.0000	0.00	5.0	4.99	0.00	0.00	0.00	0.00	130.33	10.0%	
														61.44	38.07			
Total State Potential Emissions:												22.34	536.14	97.85	54.70			
Federal Potential Emissions (controlled):																		
										Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr			
										VOC	PM							
Total Federal Potential Emissions:										0.00%	99.00%	22.34	536.14	97.85	0.55			

Note: Only the worst case base coatings for VOC and PM are shown.

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: HAP Emission Calculations

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
PIT ID: 133-00019
Reviewer: Trish Earls
Date: July 16, 2001

Material	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % MEK	Weight % Toluene	Weight % Isopropyl benzene	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Isopropylbenzene Emissions (ton/yr)
New Robot Paint Line - Garnish FR Door R/H - L/H														
L Gray FG 27245	Primer	7.88	0.0134	59.00	2.72%	6.42%	0.00%	4.69%	0.00%	0.74	1.75	0.00	1.28	0.00
Green Mica FG 26425	Base	8.04	0.0285	59.00	6.07%	2.04%	0.97%	0.13%	0.00%	3.59	1.21	0.57	0.08	0.00
Cream White FG 26426	Base	9.96	0.0230	59.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.46	0.02	0.07	0.08	0.00
Black Mica FG 23065	Base	7.80	0.0294	59.00	6.31%	1.46%	0.71%	0.13%	0.00%	3.74	0.87	0.42	0.08	0.00
Green Gray FG 26427	Base	7.95	0.0288	59.00	5.29%	2.56%	1.19%	0.11%	0.00%	3.13	1.51	0.70	0.07	0.00
Red Mica FG 25392	Base	7.83	0.0293	59.00	5.81%	1.29%	0.62%	0.12%	0.00%	3.44	0.76	0.37	0.07	0.00
Dark Blue FG 22215	Base	8.04	0.0285	59.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.63	3.91	0.57	0.05	0.00
Rio Red FG 23291	Base	8.26	0.0277	59.00	6.61%	3.59%	1.64%	0.13%	0.06%	3.91	2.12	0.97	0.08	0.04
Warm Gray FG 26445	Base	7.98	0.0288	59.00	5.66%	0.91%	0.46%	0.11%	0.00%	3.36	0.54	0.27	0.07	0.00
Clear Coat FG 14217	Clear	8.09	0.0272	59.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.78	0.00	0.00	5.12	0.00
										5.43	5.66	0.97	6.48	0.04
New Robot Paint Line - Garnish RR Door R/H - L/H														
L Gray FG 27245	Primer	7.88	0.0112	69.00	2.72%	6.42%	0.00%	4.69%	0.00%	0.73	1.71	0.00	1.25	0.00
Green Mica FG 26425	Base	8.04	0.0245	69.00	6.07%	2.04%	0.97%	0.13%	0.00%	3.61	1.21	0.58	0.08	0.00
Cream White FG 26426	Base	9.96	0.0198	69.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.46	0.02	0.07	0.08	0.00
Black Mica FG 23065	Base	7.80	0.0252	69.00	6.31%	1.46%	0.71%	0.13%	0.00%	3.75	0.87	0.42	0.08	0.00
Green Gray FG 26427	Base	7.95	0.0248	69.00	5.29%	2.56%	1.19%	0.11%	0.00%	3.15	1.53	0.71	0.07	0.00
Red Mica FG 25392	Base	7.83	0.0251	69.00	5.81%	1.29%	0.62%	0.12%	0.00%	3.45	0.77	0.37	0.07	0.00
Dark Blue FG 22215	Base	8.04	0.0246	69.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.64	3.95	0.57	0.05	0.00
Rio Red FG 23291	Base	8.26	0.0238	69.00	6.61%	3.59%	1.64%	0.13%	0.06%	3.93	2.13	0.97	0.08	0.04
Warm Gray FG 26445	Base	7.98	0.0247	69.00	5.66%	0.91%	0.46%	0.11%	0.00%	3.37	0.54	0.27	0.07	0.00
Clear Coat FG 14217	Clear	8.09	0.0231	69.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.78	0.00	0.00	5.08	0.00
										5.43	5.66	0.97	6.42	0.04
New Robot Paint Line - Garnish RR Fender R/H - L/H														
L Gray FG 27245	Primer	7.88	0.0268	30.00	2.72%	6.42%	0.00%	4.69%	0.00%	0.75	1.78	0.00	1.30	0.00
Green Mica FG 26425	Base	8.04	0.0572	30.00	6.07%	2.04%	0.97%	0.13%	0.00%	3.67	1.23	0.59	0.08	0.00
Cream White FG 26426	Base	9.96	0.0462	30.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.47	0.02	0.07	0.08	0.00
Black Mica FG 23065	Base	7.80	0.0590	30.00	6.31%	1.46%	0.71%	0.13%	0.00%	3.82	0.88	0.43	0.08	0.00
Green Gray FG 26427	Base	7.95	0.0579	30.00	5.29%	2.56%	1.19%	0.11%	0.00%	3.20	1.55	0.72	0.07	0.00
Red Mica FG 25392	Base	7.83	0.0587	30.00	5.81%	1.29%	0.62%	0.12%	0.00%	3.51	0.78	0.37	0.07	0.00
Dark Blue FG 22215	Base	8.04	0.0572	30.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.65	3.99	0.58	0.05	0.00
Rio Red FG 23291	Base	8.26	0.0557	30.00	6.61%	3.59%	1.64%	0.13%	0.06%	4.00	2.17	0.99	0.08	0.04
Warm Gray FG 26445	Base	7.98	0.0578	30.00	5.66%	0.91%	0.46%	0.11%	0.00%	3.43	0.55	0.28	0.07	0.00
Clear Coat FG 14217	Clear	8.09	0.0544	30.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.80	0.00	0.00	5.20	0.00
										5.55	5.77	0.99	6.59	0.04
New Robot Paint Line - Side SIII R/H - L/H														
L Gray FG 27245	Primer	7.88	0.0134	63.00	2.72%	6.42%	0.00%	4.69%	0.00%	0.79	1.87	0.00	1.37	0.00
Green Mica FG 26425	Base	8.04	0.0268	63.00	6.07%	2.04%	0.97%	0.13%	0.00%	3.61	1.21	0.58	0.08	0.00
Cream White FG 26426	Base	9.96	0.0217	63.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.47	0.02	0.07	0.08	0.00
Black Mica FG 23065	Base	7.80	0.0277	63.00	6.31%	1.46%	0.71%	0.13%	0.00%	3.76	0.87	0.42	0.08	0.00
Green Gray FG 26427	Base	7.95	0.0271	63.00	5.29%	2.56%	1.19%	0.11%	0.00%	3.14	1.52	0.71	0.07	0.00
Red Mica FG 25392	Base	7.83	0.0275	63.00	5.81%	1.29%	0.62%	0.12%	0.00%	3.45	0.77	0.37	0.07	0.00
Dark Blue FG 22215	Base	8.04	0.0269	63.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.64	3.94	0.57	0.05	0.00
Rio Red FG 23291	Base	8.26	0.0261	63.00	6.61%	3.59%	1.64%	0.13%	0.06%	3.93	2.14	0.98	0.08	0.04
Warm Gray FG 26445	Base	7.98	0.0271	63.00	5.66%	0.91%	0.46%	0.11%	0.00%	3.38	0.54	0.27	0.07	0.00
Clear Coat FG 14217	Clear	8.09	0.0255	63.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.78	0.00	0.00	5.12	0.00
										5.51	5.81	0.98	6.57	0.04
New Robot Paint Line - Garnish FR FF R/H - L/H														
L Gray FG 27245	Primer	7.88	0.0045	127.00	2.72%	6.42%	0.00%	4.69%	0.00%	0.54	1.27	0.00	0.93	0.00
Green Mica FG 26425	Base	8.04	0.0133	127.00	6.07%	2.04%	0.97%	0.13%	0.00%	3.61	1.21	0.58	0.08	0.00
Cream White FG 26426	Base	9.96	0.0108	127.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.47	0.02	0.07	0.08	0.00
Black Mica FG 23065	Base	7.80	0.0138	127.00	6.31%	1.46%	0.71%	0.13%	0.00%	3.78	0.87	0.43	0.08	0.00
Green Gray FG 26427	Base	7.95	0.0136	127.00	5.29%	2.56%	1.19%	0.11%	0.00%	3.18	1.54	0.71	0.07	0.00
Red Mica FG 25392	Base	7.83	0.0137	127.00	5.81%	1.29%	0.62%	0.12%	0.00%	3.47	0.77	0.37	0.07	0.00
Dark Blue FG 22215	Base	8.04	0.0133	127.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.64	3.93	0.57	0.05	0.00
Rio Red FG 23291	Base	8.26	0.0130	127.00	6.61%	3.59%	1.64%	0.13%	0.06%	3.95	2.14	0.98	0.08	0.04
Warm Gray FG 26445	Base	7.98	0.0135	127.00	5.66%	0.91%	0.46%	0.11%	0.00%	3.39	0.55	0.28	0.07	0.00
Clear Coat FG 14217	Clear	8.09	0.0119	127.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.74	0.00	0.00	4.82	0.00
										5.22	5.19	0.98	5.83	0.04
New Robot Paint Line - Tailgate														
L Gray FG 27245	Primer	7.88	0.0179	44.00	2.72%	6.42%	0.00%	4.69%	0.00%	0.74	1.75	0.00	1.27	0.00
Green Mica FG 26425	Base	8.04	0.0381	44.00	6.07%	2.04%	0.97%	0.13%	0.00%	3.58	1.20	0.57	0.08	0.00
Cream White FG 26426	Base	9.96	0.0308	44.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.46	0.02	0.07	0.08	0.00
Black Mica FG 23065	Base	7.80	0.0393	44.00	6.31%	1.46%	0.71%	0.13%	0.00%	3.73	0.86	0.42	0.08	0.00
Green Gray FG 26427	Base	7.95	0.0386	44.00	5.29%	2.56%	1.19%	0.11%	0.00%	3.13	1.51	0.70	0.07	0.00
Red Mica FG 25392	Base	7.83	0.0392	44.00	5.81%	1.29%	0.62%	0.12%	0.00%	3.44	0.76	0.37	0.07	0.00
Dark Blue FG 22215	Base	8.04	0.0381	44.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.63	3.90	0.57	0.05	0.00
Rio Red FG 23291	Base	8.26	0.0371	44.00	6.61%	3.59%	1.64%	0.13%	0.06%	3.90	2.12	0.97	0.08	0.04
Warm Gray FG 26445	Base	7.98	0.0385	44.00	5.66%	0.91%	0.46%	0.11%	0.00%	3.35	0.54	0.27	0.07	0.00
Clear Coat FG 14217	Clear	8.09	0.0367	44.00	1.38%	0.00%	0.00%	9.00%	0.00%	0.79	0.00	0.00	5.15	0.00
										5.43	5.64	0.97	6.51	0.04
New Robot Paint Line - Fuel Cap Cover														
L Gray FG 27245	Primer	7.88	0.0018	354.00	2.72%	6.42%	0.00%	4.69%	0.00%	0.60	1.41	0.00	1.03	0.00
Green Mica FG 26425	Base	8.04	0.0048	354.00	6.07%	2.04%	0.97%	0.13%	0.00%	3.63	1.22	0.58	0.08	0.00
Cream White FG 26426	Base	9.96	0.0039	354.00	0.78%	0.04%	0.11%	0.14%	0.00%	0.47	0.02	0.07	0.08	0.00
Black Mica FG 23065	Base	7.80	0.0049	354.00	6.31%	1.46%	0.71%	0.13%	0.00%	3.74	0.87	0.42	0.08	0.00
Green Gray FG 26427	Base	7.95	0.0048	354.00	5.29%	2.56%	1.19%	0.11%	0.00%	3.13	1.51	0.70	0.07	0.00
Red Mica FG 25392	Base	7.83	0.0049	354.00	5.81%	1.29%	0.62%	0.12%	0.00%	3.46	0.77	0.37	0.07	0.00
Dark Blue FG 22215	Base	8.04	0.0048	354.00	1.07%	6.60%	0.96%	0.09%	0.00%	0.64	3.95	0.57	0.05	0.00
Rio Red FG 23291	Base	8.26	0.0047	354.00	6.61%	3.59%	1.64%	0.13%	0.06%	3.98	2.16	0.99	0.08	0.04
Warm Gray FG 26445	Base	7.98	0.0048	354.00	5.66%	0.91%	0.46%	0.11%	0.00%	3.36	0.54	0.27		

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 12 of 13 TSD App A

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
Plt ID: 133-00019
Reviewer: Trish Earls
Date: July 16, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
14.0	122.6

Heat Input Capacity includes one (1) 9.0 MMBtu per hour boiler, two (2) 0.8 MMBtu per hour bake ovens, one (1) 0.4 MMBtu per hour bake oven, and two (2) heater boxes for the new convection curing oven each rated at 1.5 MMBtu/hr.

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.12	0.47	0.04	6.13	0.34	5.15

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 13 for HAPs emissions calculations.

326 IAC 6-2-4 Allowable PM Emissions Calculation

$$Pt = 1.09/Q^{0.26}$$

$$= 0.62 \text{ lb/MMBtu heat input}$$

$$\text{Where } Q = 9.0 \text{ MMBtu/hr}$$

$$Pt = 5.4 \text{ lb/hr for the 9.0 MMBtu/hr boiler (will comply)}$$

However, pursuant to 326 IAC 6-2-4(a), Pt shall not exceed 0.6 lb/MMBtu heat input for Q less than 10 MMBtu/hr.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions**

Page 13 of 13 TSD App A

Company Name: H.A. Parts Products of Indiana Company
Address City IN Zip: 2200 State Road 240 East, Greencastle, Indiana 46135
Operating Permit No.: T133-12660
Plt ID: 133-00019
Reviewer: Trish Earls
Date: July 16, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.288E-04	7.358E-05	4.599E-03	1.104E-01	2.085E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total
Potential Emission in tons/yr	3.066E-05	6.745E-05	8.585E-05	2.330E-05	1.288E-04	1.2E-01

Methodology is the same as page 12.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.